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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
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JUL - 1 1996

**RECEIVED**

JUL - 3 1996

Re: Potomac Yard Site  
Alexandria and Arlington County, VA

REMEDIATION ENFORCEMENT & QA SECTION  
WHEELING OFFICE

Dear Mr. Martin:

This is in response to your letter of May 23, 1996 concerning the sampling of drainage ditches beyond the property line of Potomac Yard. Your letter discusses several points that argue against sampling the ditches beyond the property line of Potomac Yard. After lengthy consideration Environmental Protection Agency (EPA) has concluded that sampling of the ditches is necessary to determine the extent of contamination at the Site. Because of your concerns, EPA has concluded that the best course of action is for EPA to perform the sampling of the ditches.

EPA's requirement to sample the drainage ditches is not specifically related to defining the impact of Potomac Yard on ecological receptors in the Potomac River. Although the requirement to sample these drainage ditches has been made in the context of comments made by EPA on the off-site ecological risk assessment work plan, the requirement to sample the drainage ditches is based upon the results of the extent of contamination study (ECS) and on-site ecological risk assessment which indicated that several contaminants are present in the drainage ditches at the site property line which exceed ecological screening criteria. It is my understanding that the issue of sampling the drainage ditches beyond the property line had been previously raised by EPA during approval of the ECS work plan. EPA approved the ECS work plan with the understanding that sampling in the drainage ditches would not be necessary if the results of the on-site sampling of the drainage ditches and on-site risk assessment indicated that elevated levels of contaminants were not present or that no risk to human or ecological receptors were posed by contaminants found in the drainage ditches. As pointed out above, several contaminants were found to be present in the drainage ditches up to the site property boundary, hence the requirement to now define the extent

of that contamination in the drainage ditches beyond that property boundary.

EPA needs to be consistent in its approach when investigating the contamination that may be located on a site. It should be noted that EPA considers the site as that area that contains the contamination including areas adjacent to the property where the contamination has migrated. The contamination in the ditches could potentially continue to leach or erode into environmentally sensitive areas. EPA will typically remediate the contamination to levels below human health or environmental risk levels. In some instances, those levels are standards that regulatory agencies have developed or adopted, such as the sediments criteria for streams, which is the case for the ditches at Potomac Yard. The contaminated sediment of the drainage ditches is a potential source of contamination to the Potomac River. Once the ditches are known to have contamination, EPA is responsible to determine the extent of this contamination.

In this case, EPA needs to determine the extent of the sediment contamination in the ditches and not be limited to the arbitrary boundary of the Potomac Yard property. If left unsampled, the cleanup of the ditches could possibly omit a length of the ditches that contain contamination above the sediment criteria. Your letter states that the sampling in the Potomac River or Four Mile Run and the subsequent eco-risk assessment will determine the overall "health" of the receiving streams. The eco-risk assessment will determine what, if any, clean-up of the receiving streams is necessary due to the release of contamination from Potomac Yard. The sampling of the ditches will determine the extent of the cleanup of the ditches; that is, the cleanup of those areas of the ditches that are showing contamination over the sediment criteria.

I wish to address the points that you summarized in your letter. First, your letter states that "the ditches are not part of the 'Site' as defined by the AOC, and RF&P never agreed in the AOC to sample them." EPA considers the site to be those areas where the contamination has migrated. The ditches are showing contamination at the property line so it is probable that the contamination does not stop at the property line but has traveled some indeterminate distance from the property line. EPA needs to determine what that distance is.

Second, you state that "the ditches carry storm water from the streets of Alexandria, George Washington National Parkway and Dangerfield Island that no doubt contains contaminants one would expect to find in urban areas. Thus, the source of any contaminants detected in the ditches will be open to question and to potential controversy with the City of Alexandria, the National Park Service and businesses in the area, e.g. service stations, auto paint shops, printers, etc." EPA is aware that there are many contributors to the contamination in the ditches. As stated above however, the sampling is necessary to

characterize the extent of contamination. EPA is also aware that there will be controversy if the ditches contain contaminants over the sediment criteria. Because of this controversy, EPA acknowledges your concerns about the sampling the ditches and, rather than using the Administrative Order to perform the sampling, EPA will perform the sampling.

Third, "the data needed for the off-site risk assessment can be obtained by implementing the present work plan we have already negotiated with the Removal Branch, BTAG, and NOAA." The sampling of the ditches is to determine the extent of the contamination in the ditches and will not be used for the off-site risk assessment. The sampling of the ditches will delineate the areas of the ditches that need to be cleaned to prevent additional migration of contaminants into the streams. The risk assessment will determine the impact on the stream from the contamination that presently exists in the sediment and what, if any, cleanup of the streams is necessary.

If you have any question, please contact me.

Sincerely,



Thomas C. Voltaggio, Director  
Hazardous Waste Management Division

cc: Abe Ferdas, Office of Superfund Programs (3HW02)  
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